

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) JAMES GRAHAM, as SPECIAL ADMINISTRATOR  
for the ESTATE OF ANTHONY HUFF, Deceased,

Plaintiff,

vs.

Case No. 5:17-cv-00634-SLP

(1) GARFIELD COUNTY CRIMINAL JUSTICE  
AUTHORITY, an Oklahoma Title 60 authority;  
(2) BOARD OF COUNTY COMMISSIONERS OF THE  
COUNTY OF GARFIELD, a Political Subdivision of the  
State of Oklahoma;  
(3) JERRY NILES, individually;  
(4) THE SHERIFF OF GARFIELD COUNTY, in his  
Official Capacity;  
(5) JENNIFER NILES, individually and in her official  
capacity as Jail Administrator of the Garfield County jail;  
(6) TURN KEY HEALTH CLINICS, LLC, an Oklahoma  
limited liability corporation;  
(7) LELA GOATLEY, an individual; and  
(8-10) JOHN DOES (1-3), unknown individuals who were  
involved but not yet identified,

Defendants.

**PLAINTIFF'S WITNESS AND EXHIBIT LIST**

Plaintiff, James Graham, as Special Administrator for the Estate of Anthony Huff, deceased, may call any or all of the following witnesses for his case in chief during trial. Plaintiff reserves the right to amend or supplement his list of witnesses upon completion of discovery.

**WITNESS LIST**

<b>No.</b>	<b>Witnesses</b>	<b>Proposed Testimony</b>	<b>Expected / May Be Called</b>
1.	James Graham Enid, OK	Deposed. Will testify as to background, history and facts related to Anthony Huff	Expected
2.	Jerry Niles Sheriff Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Deposed. Will testify as to facts and circumstances related to use of restraint chairs; matters related to Anthony Huff; organization, rules, policies and procedures related to Garfield County Sheriff's Office	Expected
3.	Jennifer Niles Jail Administrator Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Deposed. Will testify as to facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	Expected
4.	John Markus Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Deposed. Will testify as to facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	Expected

No.	Witnesses	Proposed Testimony	Expected / May Be Called
5.	Aaron Moore Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Will testify as to facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	Expected
6.	Andrew Gibson Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Will testify as to facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	May be Called
7.	Austin Burkes Enid Police Department	Will testify as to facts and circumstances surrounding June 4, 2016, arrest of Mr. Huff and his history with Mr. Huff	Expected
8.	Jason Reim Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Called by Garfield County Sheriff's Office after Mr. Huff died and started an investigation	May be Called
9.	Steven Bartley Fire Dept.	Will testify arrived at scene after Mr. Huff died and facts and circumstances surrounding scene	May be Called

No.	Witnesses	Proposed Testimony	Expected / May Be Called
10.	Jason Cunningham Fire Dept.	Will testify arrived at scene after Mr. Huff died and facts and circumstances surrounding scene	May be Called
11.	Matthew Nels Fire Dept.	Will testify arrived at scene after Mr. Huff died and facts and circumstances surrounding scene	May be Called
12.	Matthew Decker EMS personnel	Will testify arrived at scene after Mr. Huff died and facts and circumstances surrounding scene	May be Called
13.	Taylor Miller EMS personnel	Will testify arrived at scene after Mr. Huff died and facts and circumstances surrounding scene	May be Called
14.	Pharon Muller Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Will testify as to facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	May be Called

No.	Witnesses	Proposed Testimony	Expected / May Be Called
15.	Jonathan Tietz Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Will testify as to facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	May be Called
16.	Daylen Rivers Jailer Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Will testify discovered Mr. Huff unresponsive at 1813 hours; will testify as to facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	May be Called
17.	Amanda Pester Jailer Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Will testify discovered Mr. Huff unresponsive at 1813 hours; will testify as to facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	Expected

No.	Witnesses	Proposed Testimony	Expected / May Be Called
18.	Rickie Callender Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Was on shift at time Mr. Huff died; will testify as to facts and circumstances surrounding activities at time of his death; facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	May be Called
19.	Austin White Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Was on shift at time Mr. Huff died; will testify as to facts and circumstances surrounding activities at time of his death; facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	Expected

No.	Witnesses	Proposed Testimony	Expected / May Be Called
20.	Kera Marshall Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Was on shift at time Mr. Huff died; will testify as to facts and circumstances surrounding activities at time of his death; facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	May be Called
21.	Jacob Hawkins Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Was on shift at time Mr. Huff died; will testify as to facts and circumstances surrounding activities at time of his death; facts and circumstances related to organization, rules, policies and procedures related to Garfield County Sheriff's Office; use of restraint chairs and matters related to Anthony Huff	May be Called

No.	Witnesses	Proposed Testimony	Expected / May Be Called
22.	Shawna Galusha Garfield County Sheriff's Office P.O. Box 1866 Enid, OK 73702	Deposed. Will testify was on shift at time Mr. Huff died; will testify as to facts and circumstances surrounding activities at time of his death, policies and procedures related to use of restraint chair and circulation checks	Expected
23.	Vanisa Jo Gay, LPN 424 N. Short Ringwood, OK 73768	Will testify as to observations of Mr. Huff on June 7, 2016; pattern and practice of Turn Key and treatment of detainees, inmates and Mr. Huff	Expected
24.	Lela Goatley, NP 27557 91 <sup>st</sup> Road Arkansas City, KS 67005	Deposed. Will testify as to observations of Mr. Huff on June 7, 2016; pattern and practice of Turn Key and treatment of detainees, inmates and Mr. Huff	Expected
25.	Vanessa Adkinson 4056 Diamond Ridge View Colorado Springs, CO 80918	Will testify as to facts and circumstances related to complaints to Garfield County Sheriff's office cutting off video feed, policies and procedures related to treatment of detainees/inmates before the detention of Mr. Huff, and prior notice of issues to Sheriff's office	Expected



No.	Witnesses	Proposed Testimony	Expected / May Be Called
26.	Cory Rink Address unknown at this time	Will testify as to policies and procedure of Garfield County Sheriff's office, policies and procedures related to operations of jail and treatment of detainees and inmates	May be Called
27.	Lloyd Cross Address unknown at this time	Will testify as to policies and procedure of Garfield County Sheriff's office, policies and procedures related to operations of jail and treatment of detainees and inmates	May be Called
28.	Steve Tanio 1600 Main St. Woodward, OK 73801	Will testify as to policies and procedure of Garfield County Sheriff's office, policies and procedures related to operations of jail and treatment of detainees and inmates	May be Called
29.	Venessa Eden 729 N. 14 <sup>th</sup> Enid, OK 73701	Will testify as to facts and circumstances surrounding events leading to Mr. Huff's death	Expected
30.	Elaine Raines (Nelson) 1020 S. 10 <sup>th</sup> St. Enid, OK 73701	Will testify as to facts and circumstances surrounding events leading to Mr. Huff's death	Expected

No.	Witnesses	Proposed Testimony	Expected / May Be Called
31.	Arturo Saldana 10716 N. Council Rd., Apt. 11 Oklahoma City, OK	Will testify as to facts and circumstances surrounding events leading to Mr. Huff's death	May be Called
32.	Joel Marquez William S. Key Correctional Center. One William S. Key Blvd. Ft. Supply, OK 73841	Will testify as to facts and circumstances surrounding events leading to Mr. Huff's death	May be Called
33.	Charles Dancer OSBI 723 S. Lewis Stillwater, OK 74076	Will testify as to facts and circumstances surrounding events leading to Mr. Huff's death	Expected
34.	Marc Harrison Medical Examiner 901 N. Stonewall Oklahoma City OK 73117	Medical Examiner will testify as to the autopsy and his findings	Expected
35.	Trent Smith Oklahoma City, OK	Principal of Turn Key will testify as to facts and circumstances, and conduct, of Turn Key in providing health services to detainees and prisoners in jails located in Oklahoma.	Expected
36.	Vonda Gatson Enid, OK	Anthony Huff's sister will testify as to facts and circumstances surrounding her brother	Expected
37.	Valgene Webster Enid, OK	Anthony Huff's cousin will testify as to facts and circumstances surrounding his cousin	Expected

No.	Witnesses	Proposed Testimony	Expected / May Be Called
38.	Carlos Torres	Will testify as to facts and circumstances surrounding the use of the restraint chair in Garfield County	May be Called
39.	JP Mullen	Will testify as to facts and circumstances surrounding the use of the restraint chair in Garfield County Detention Center	Expected
40.	Jack McFadden	Will testify as to treatment of inmates or detainees at the Garfield County Detention Center	
41.	Ronald F. Distefano, D.O. 3460 E. 76 <sup>th</sup> Street Tulsa, OK 74136	Expert. Will testify as to standards of care of medicine in treating people like Plaintiff for alcohol withdrawals	Expected
42.	Jeffrey Schwartz 1610 La Pradera Dr. Campbell, CA 95008	Consultant. May become testifying expert Will testify as to standards of care and acceptable policies and procedures related to the use of restraint chairs and treatment of inmates/detainees in jail	Expected

No.	Witnesses	Proposed Testimony	Expected / May Be Called
43.	Jillian Unger 1309 E. Cherry Enid, OK	Will testify as to facts and circumstances surrounding his conduct that led to charges being filed in Case No. CF-2011-4 in Garfield County, and his statements that “I don’t give a shit about people so why care about the cat” and threat toward her.	Expected
44.	Lyndsie Davis Enid, OK	Will testify as to issues related to conduct and actions related to John Markus	Expected
45.	Officer Shawn Ramsey Badge No. 801 Enid, OK	Will testify as to facts and circumstances surrounding investigation and charges into John Robert Markus in December 2010/January 2011.	Expected
46.	John Roache, Ph.D. UTHSC 7703 Floyd Curl Drive San Antonio, TX 78229	Expert will testify as to how alcohol and detoxification and affects on body, impact on Mr. Huff, how to treat and diagnose conditions	Expected
47.	Cheri Weber Garfield County Sheriff’s Office	Facts and circumstances surrounding operations at the jail, policies and procedures related to Sheriff’s office and facts and circumstance surrounding Mr. Huff’s death	May be Called

No.	Witnesses	Proposed Testimony	Expected / May Be Called
48.	Dariel Momsen Garfield County Sheriff's Office	Facts and circumstances surrounding operations at the jail, policies and procedures related to Sheriff's office and facts and circumstance surrounding Mr. Huff's death	May be Called
49.	Espaniola Bowen Oklahoma State Dept. Of Health	Will testify as to her inspection of the Jail and investigation related to Mr. Huff's death	May be Called
50.	Flint Junod c/o Johnson Hanan Vosler	Deposed. Will testify about matters related to Turn Key policies and procedures, contract with Garfield County	Expected
51.	All witnesses listed by all other parties, whether called or not		
52.	All witnesses whose identifies are determined during the course of discovery		

### EXHIBIT LIST

Plaintiff, James Graham, as Special Administrator for the Estate of Anthony Huff, deceased, may offer any or all of the following exhibits in his case in chief during trial. Plaintiff reserves the right to amend or supplement his exhibit list upon completion of discovery.

No.	Description	Expected / May Be Used
1.	Video of Mr. Huff in the chair	Expected

No.	Description	Expected / May Be Used
2.	Enid Police Department of June 4, 2016, Incident/Offense Report	Expected
3.	Incident report (SDT 1-2)	Expected
4.	Booking sheet of 6.4.16 (SDT 3)	Expected
5.	Garfield County Medical / Mental Screening 3/14/14 (SDT 0006-007)	Expected
6.	Restraint Chair Log Sheet (SDT 8-10)	Expected
7.	Shift Log (Starts with Day Shift 6.3.16) (SDT 11-48)	Expected
8.	Incident Report (SDT 46-51)	Expected
9.	Release Sheet (SDT 52)	Expected
10.	June 8, 2016, statement of Jacob Hawkins (SDT 62)	Expected
11.	June 8, 2016, statement of Amanda Pester (SDT 61)	Expected
12.	June 8, 2016, statement of Shawn Galusha (SDT 65)	Expected
13.	June 8, 2016, statement of Daylen Rivers (SDT 63)	Expected
14.	June 8, 2016, statement of Rickie Callender (SDT 64)	Expected
15.	June 8, 2016, statement of Kera Marshall (SDT 66)	Expected
16.	Jail Incident Report	Expected
17.	Undated Note from Elaine Nelson (SDT 70)	Expected
18.	Release Sheet (SDT 52-53)	Expected
19.	Use of Force Report dated 6.6.16. (SDT 54)	Expected
20.	Speed letter from S. Galusha to Rickie Callender (SDT 55)	Expected

No.	Description	Expected / May Be Used
21.	Speed letter from S. Galusha to Amanda Pester (SDT 57)	Expected
22.	Procedures for Use of Restraint Chair	Expected
23.	Safety Restraint Chair Instructions by Manufacturer (Safety Restraint Chair Inc. For SureGuard Correctional Chair)	Expected
24.	Oklahoma State Department of Health Jail Standards CH. 670	Expected
25.	June 8, 2016 Patient Care Record	Expected
26.	Medical records related to Mr.Huff	Expected
27.	Photographs of Mr. Huff (Huff 1580-1586)	Expected
28.	Drawings and artwork by Mr. Huff (Huff 1587-1602)	Expected
29.	Attorney General Opinion 88-45 (Ops.Okla.Atty.Gen. 1989) Nepotism	Expected
30.	Pleadings contained in Estate of Davis v. Turn Key Health Clinics, LLC, et al., Case No. CIV-17-807	May be Called
31.	Pleadings contained in Marez v. Turn Key Health Clinics, LLC., et al, Case No. (Cleveland County)	May be Called
32.	Pleadings contained in Pruett v. Turn Key Health Clinics, LLC., et al, Case No. (Cleveland County)	May be Called
33.	Pleadings contained in Foutch v. Turn Key Health Clinics, LLC., et al., Case No. CIV-17-431 (Eastern District of Oklahoma)	May be Called
34.	April 4, 2016, letter from Eddie Wyant to Sheriff Niles (Ex. 32 to J.Niles dep.)	Expected
35.	Plea of Guilty by Jennifer Shay Niles, Case No. CF-18-79 filed in District Court of Garfield County	Expected

No.	Description	Expected / May Be Used
36.	Sentence on plea of Guilty of Jennifer Shay Niles, April 30, 2019, Case No. CF-18-79 filed in District Court of Garfield County, State of Oklahoma	Expected
37.	Transcript of Sentencing Hearing of Jennifer Shay Niles on April 30, 2019	Expected
38.	Plea of Guilty and/or No Contest of Shawn Galusha dated March 11, 2019 in District Court of Garfield County, State of Oklahoma, Case No. CF-18-78.	Expected
39.	Plea of Guilty of John Markus dated March 11, 2019, in District Court of Garfield County, State of Oklahoma, Case No. CF-18-77.	Expected
40.	January 2011 Criminal Felony Amended Information related to John Robert Markus	Expected
41.	Affidavit of Shawn Ramsey signed December 18, 2010.	Expected
42.	Photographs of Restraint Chair	Expected
43.	Manufacturer's information related to Restraint Chair	Expected
44.	Photographs of area of Jail	Expected
45.	Diagram of area of Jail where Mr. Huff was confined and surrounding areas	Expected
46.	Policies and procedures of Garfield County Detention Facility (00831-878)	Expected
47.	Policies and procedures of Garfield County Detention Facility related to Restraint Chair in force at time of Mr. Huff's death (Ex. 28 to J. Niles dep.)	Expected
48.	Medical Mental Screening of Mr. Huff dated 1/10/16 (Ex. 25 to Galusha dep.)	Expected
49.	Medical Intake Form Mental Screening of Mr. Huff dated 5/13/16 (Ex. 26 to Galusha dep.)	Expected



No.	Description	Expected / May Be Used
50.	Section 019 Restraint Chair/Restraints (11-12) in force at time of Mr. Huff's death.	Expected
51.	Procedures for Use of the Restraint Chair (Attachment D OP-050108)	Expected
52.	Turn Key Policies and Procedures related to Intoxication and Withdrawal (Huff-PP0001-03)	Expected
53.	Policies and Procedure Development and Review (Huff PP0004-0005)	Expected
54.	Policies and Procedure Development and Review Orientation for Health Staff (0006-0007)	Expected
55.	Policies and Procedure Development and Review Pharmaceutical and Medication Management (Huff PP 0026-0028).	Expected
56.	Contract between Turn Key and Garfield County (Huff GC0005-0019)	Expected
57.	Turn Key insurance policy limits for policy applicable to June of 2016 (AMWINS 2709-2711)	Expected
58.	Documents from prior booking showing history of withdrawals	Expected
59.	Day Shift Handwritten Logs (2357-2361) (Ex. 19 to Markus dep.)	Expected
60.	Handwritten Shift Notes starting June 6, 2016 (Ex. 20 to Markus dep.)	Expected
61.	Use of Force Report (Ex. 21 to Markus dep.)	Expected
62.	Restraint Chair Log Sheet related to Huff starting 6/6/16@1151 by Markus and Vanessa (Ex. 22 to Markus dep.)	Expected
63.	(A-I) Photographs of Mr. Huff, chair and scene taken at jail after he died)	Expected
64.	Enid Police Dept. Uniform Incident/Offense Report (Arrest Report) of June 4, 2016 (2 pages by A. Burkes, ID # 9001)	Expected

No.	Description	Expected / May Be Used
65.	Sick Call Request Form of May 14, 2014 (TK0021)	Expected
66.	ED Physician Record (5/4/16) (TK23-37).	Expected
67.	Provider Note of 5/17/16 related to Mr. Huff signed by Goatley (TK 0038)	Expected
68.	Medication Administration Record for Mr. Huff dated May 2016 (TK 0039)	Expected
69.	Financial Records of Defendant Turn Key	Expected
70.	Turn Key Tax Information TK-TAX 0001-0099 (For Second Stage/Punitive Damages Portion of Trial only)	Expected
71.	Turn Key Financial Information TK-FIN0001-0003 (For Second Stage Punitive Damages Portion of Trial only).	Expected
72.	Turn Key Proposal to Garfield County Huff - GC 001-004	Expected
73.	Turn Key Contract with Garfield County Huff-GC 005-018	Expected
74.	Expert Report of John Roache, Ph.D.	Expected
75.	CV of John Roache, Ph.D.	Expected
76.	Expert Report of Jeffrey Schwartz	Expected
77.	CV of Jeffrey Schwartz	Expected
78.	Medical Records related to Mr. Huff obtained by Jail on May 13, 2016 (SDT 92-101) related to care	Expected
79.	Garfield County Medical / Mental Screening 3/6/13 (SDT 109-110)	Expected
80.	All records or exhibits listed by all other parties, and not objected to by Plaintiff.	
81.	All exhibits obtained during the course of discovery.	

*s/David B. Donchin*

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**CERTIFICATE OF SERVICE**

☒ I hereby certify that on September 3, 2019, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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*s/David B. Donchin*

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